



Gary R. Jacobson
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June 8, 2006

Mr. Philip Allen
Remedial Project Manager
6PD
United States Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202

Dear Mr. Allen:

Re: Revised Work Plan
Remedial Investigation
Star Lake Canal Superfund Site
Jefferson County, Texas
CERCLA Docket No. 06-02-06

Pursuant to the Administrative Settlement Agreement and Order on Consent (AOC) between the United States Environmental Protection Agency (EPA), Chevron Environmental Management Company (CEMC), and Huntsman Petrochemical Corporation (Huntsman), please find the enclosed revised work plan for the remedial investigation (RI) for the Star Lake Canal Superfund site in Jefferson County, Texas. The revised work plan incorporates the review comments as received on April 24, 2006 from the EPA, the Texas Commission of Environmental Quality (TCEQ), and identified relevant agencies. Revisions to the work plan are consistent with the issues as discussed at the meeting among representatives of EPA, CEMC, Huntsman, Conestoga-Rovers & Associates, Inc. (CRA) and ENTRIX, Inc. (ENTRIX) at the CEMC offices on May 9, 2006 and include:

Groundwater

Investigation of the potential communication between impacted groundwater beneath the Huntsman facility and the surface water in the east-west trending portion of the Star Lake Canal under the jurisdiction of the TCEQ Corrective Action Program and the facility's Site-Wide Groundwater Affected Property Assessment Report (Section 6.6).

Applicable or Relevant and Appropriate Requirements

Identification of applicable or relevant and appropriate requirements (ARARs) that may apply to the site and its remedial action along with ecological benchmarks for screening of constituents (Section 1.5).

Texas Risk Reduction Program Evaluation

Data collection and analysis in accordance with the TCEQ Texas Risk Reduction Program (TRRP) methodology and accompanying requirements under 30 TAC § 350 (Section 5 and Section 6).

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Historical Data Use

Description of the previous investigations at the site, the results, and use in development of the sampling plan (Section 2 and Section 6).

"Wetland Soils" and "Wetland Sediments"

Identification of all samples collected from wetland areas as sediment and not soil (Section 3 through Section 6).

Number and Location of Samples

Addition and modification of the number and location of samples in open water areas around Molasses Bayou and in potential dredge spoils along Jefferson Canal (Section 6). In summary, a comparison of types and numbers of samples between the work plan submitted on March 21, 2006 and the revised work plan enclosed follows:

	Work Plan submitted on March 21, 2006	Revised Work Plan submitted on June 8, 2006
Sample Locations	42	47
Surface Water Samples	24	26
Surface Sediment Samples	42	43
Mid-Depth Sediment Samples	9	21
Refusal-Depth Sediment Samples	9	21
Bank Soil Samples	0	4
Total Number of Samples	84	115

Data Quality Objectives

Addition of the data quality objective (DQO) seven step process to define the type, quality, and quantity of data necessary to support the Tier 1 RI (Section 6.1.1).

The quality assurance project plan (QAPP), Appendix A, was revised to address the review comments. Appendix B, the health and safety plan (HASP), was not revised. Appendix C, the standard operating procedures (SOPs), was revised to address the review comments, however, revisions were only required to SOP 003 and SOP 004; the other SOPs were not modified.

Please note that the documents will also be submitted electronically.

Please contact me if you have any questions.

Best regards,



Gary R. Jacobson
Project Coordinator

cc: Sarah Schreier, TCEQ